

kkk

UNITED STATES DISTRICT COURT
For the
DISTRICT OF MASSACHUSETTS

DR. THOMAS J. WYLY,

Plaintiff,

v.

THE INTERNATIONAL FOUNDATION
FOR EDUCATION AND SELF-HELP, and
THE LEON H. SULLIVAN FOUNDATION,

Defendants.

JOINT MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendant The International Foundation for Education and Self-Help (“IFESH”) and plaintiff Dr. Thomas J. Wyly (“Wyly”) jointly move for an extension of time for IFESH to answer or otherwise respond to the complaint for an additional thirty days up to and including August 6, 2004. The parties are requesting the additional time in order to meet and discuss the possibility of settlement, mediation or other ways of resolving this matter without further litigation.

Wherefore IFESH and Wyly respectfully request that IFESH be granted an extension of time in which to answer or otherwise respond to the complaint up to and including August 6, 2004.

DR. THOMAS J. WYLY

THE INTERNATIONAL FOUNDATION
FOR EDUCATION AND SELF-HELP

By his attorneys,

By its attorneys,



David A. Brown, BBO#556161
SHERIN AND LODGEN LLP
101 Federal Street
Boston, MA 02110
Tel: (617) 646-2000
Fax: (617) 646-2222



Marie F. Mercier, BBO #343150
KOTIN, CRABTREE & STRONG, LLP
One Bowdoin Square
Boston, Massachusetts 02114
Tel: (617) 227-7031
Fax: (617) 367-2988

Dated: July 8, 2004